



Richard T. Ellis  
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March 25, 2002

**Ex Parte**

William Caton  
Acting Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

*Re:     Application by Verizon New England for Authorization To Provide In-Region,*  
*InterLATA Services in Vermont, CC Docket No. 02-7- REDACTED*

Dear Mr. Caton:

On February 26, 2002, Verizon filed with the Commission the same cost studies it filed with the Vermont Board of Public Service (“Board”) during the UNE rate proceeding. *See Ex Parte Letter from Richard T. Ellis, Verizon, to William Caton, Acting Secretary, FCC.* Staff has asked Verizon to respond to AT&T’s claim that it needs the underlying the switch investment cost model (“SCIS”) and model inputs so it “can evaluate Verizon’s claim that its Vermont rate are appropriately cost based.” *See AT&T March 15 Ex Parte.*

First, AT&T did not ask for this information during the Vermont TELRIC proceeding, when it would have been most relevant, even though access to this information was made available to at least one other participant in that proceeding. Specifically, Verizon responded in an interrogatory submitted by the Vermont Board that “[a]ccess to the SCIS model has been made available to the Department of Public Service’s (DPS) consultant, Tom Weiss.” *See Attachment 1 (interrogatory DPS 2-34 and Verizon response).*

Having failed to request such access during the course of the Vermont TELRIC proceeding, AT&T should not be complaining about lack of access here. As Verizon explained in its March 18 ex parte filing, parties should not be permitted to raise issues for the first time before the Commission in the context of a section 271 proceeding that should have been raised at the state level. *See Ex Parte Letter from Richard T. Ellis, Verizon, to William Caton, Acting Secretary,*

FCC (March 18, 2002); *see also Arkansas/Missouri Order* ¶ 73 (declining to intercede in rate dispute before state commission resolves issue); *AT&T Corp. v. FCC*, 220 F.3d 607, 631 (noting that “allowing collateral challenges could change the nature of section 271 proceedings from an expedited process focused on an individual applicant’s performance into a wide-ranging, industry-wide examination of telecommunications law and policy”);

In any event, Verizon hereby submits two CD-ROMS containing various materials.

CD Number One Contains:

- Version 2.1 of the proprietary SCIS model (including the so-called “MOUSER” file); and
- a text file containing instructions on how to install the model.

CD Number Two Contains:

- The SCIS input database used to produce Verizon’s original proposed Vermont UNE rates;
- Revised line/trunk/usage inputs for SCIS that Verizon used for its compliance filing; and
- Worksheets for all recurring costs computed for Verizon’s compliance filing.

All material on the CD-ROMs is confidential and has been redacted. A confidential version is also being filed with the CD-ROMS. The twenty-page limit does not apply as set forth in DA 02-111. Please let me know if you have any questions.

Sincerely,



cc: J. Veach  
J. Stanley  
G. Remondino